

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JOHN PARKS,

Plaintiff,

v.

LAKE OSWEGO SCHOOL
DISTRICT; LAKE OSWEGO
SCHOOL BOARD; OREGON
SCHOOL ACTIVITIES
ASSOCIATION; PORTLAND
PUBLIC SCHOOLS; and
MARSHALL HASKINS,
individually and *in his
representative capacity for
OREGON SCHOOL ACTIVITIES
ASSOCIATION and PORTLAND
PUBLIC SCHOOLS*

Defendants.

Case No. 3:24-cv-1198-JR

**PLAINTIFF’S UNOPPOSED
MOTION FOR AN EXTENSION
OF TIME TO RESPOND TO
MOTION TO STRIKE
AMENDED COMPLAINT
[ECF No. 30]**

LR 7-1(a) CERTIFICATION

Pursuant to LR 7-1, the undersigned certifies that counsel for plaintiff John Parks conferred via electronic mail with counsel for defendant Oregon School Activities Association (“OSAA”), and defendant does not oppose this motion.

UNOPPOSED MOTION

Plaintiff John Parks respectfully requests an extension of time, up to and including December 13, 2024, to respond to OSAA's motion to strike the amended complaint [ECF No. 30]. Plaintiff requests this extension for the following reasons:

1. OSAA filed its motion to strike on Friday November 22, 2024, the same day Plaintiff and his counsel were before District Court Judge Simon for oral argument on Plaintiff's motion for preliminary injunction.

2. Following that hearing was a shortened work week this past week for the Thanksgiving holiday.

3. Additionally, Plaintiff's counsel Buck Dougherty is lead counsel on a First Amendment case against the NLRB General Counsel at the Sixth Circuit Court of Appeals, and his client's reply brief was due this week. *See Associated Builders & Contractors, Inc. of Michigan v. Jennifer A. Abruzzo*, Case No. 23-1803.

4. This motion is made in good faith and not for purposes of delay. OSAA filed its motion to strike the amended complaint on November 22, 2024, and this is Plaintiff's first request for an extension.

5. Plaintiff brings this unopposed motion without waiving any potential defense.

CONCLUSION

For these reasons, Plaintiff John Parks respectfully requests that the Court grant an extension of time, up to and including **December 13, 2024**, for him to respond to OSAA's motion to strike the amended complaint [ECF No. 30].

Dated: December 4, 2024

Respectfully submitted,

s/ M.E. Buck Dougherty III

M.E. Buck Dougherty III*

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Attorneys for Plaintiff John Parks

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically with the Court's Case Management/Electronic Case Filing (CM/ECF) system. The Court and/or Clerk of Court may serve and give notice to counsel by CM/ECF electronic transmission.

The 4th day of December 2024.

s/ M.E. Buck Dougherty III
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